

Comments With Regard to ET Docket No. 03-104

Inquiry Regarding Carrier Current Systems, including Broadband over Power Line Systems

International Broadband Electrical Communications, Inc. (IBEC)

The FCC is currently investigating the matter of Broadband over Power Lines (BPL) and the use of BPL to provide high-speed communications capabilities to all Americans. International Broadband Electric Communications, Inc. (IBEC) wishes to offer its full support for this effort within the FCC and for the expansion and deployment of BPL systems using the existing electrical power network. IBEC also supports the careful evaluation of FCC Part 15 requirements and the modification thereof as appropriate, to allow BPL to be deployed quickly and easier to a wider population, particularly those in the most remote areas of the United States, who might require modification of FCC Part 15 to enjoy the full benefits of BPL communications.

IBEC's mission is to bring broadband capabilities to all Americans, regardless of geographic location, socioeconomic status, or other factors. Following a careful analysis of all possible technologies, IBEC has concluded that the safest, most cost-effective, and reliable way to supply all Americans with broadband communications is the use of the existing electrical power grid. New technologies have been tested, validated, and deployed which prove that BPL can provide the needed services and can do so without interfering with existing wireless or wireline services. IBEC believes that given this proven state of noninterference, the BPL industry, including technology and equipment vendors as well as electric utilities, should be allowed to test and validate BPL systems which expand upon the existing FCC Part 15 limitations, while continuing to deploy present-day BPL systems which fully comply with current FCC Part 15 requirements.

IBEC understands the concerns of existing service providers and the suppliers of emergency services and other public services regarding potential interference of BPL systems with those valuable services. IBEC believes it is important that changes to FCC Part 15 be tested and evaluated with those considerations in mind. However, IBEC also believes that the advantages and quality-of-life improvements that can be provided by expanded BPL services, especially in rural and low-population-density areas of the United States, warrant a significant effort to grow the capabilities of BPL. There is no question that BPL offers the one, clear near-term opportunity to provide broadband capabilities to ALL Americans. Other technologies have proven ideal for urban areas, but BPL is the sole technology capable of providing cost-effective broadband to lesser-populated areas, which are equally deserving of the benefits of broadband. Therefore, it is vital that the FCC continue to study the careful expansion of BPL services and modifications to FCC Part 15 to enable even more Americans to have access to the economic, educational, and technology benefits of broadband communications.

In summary, IBEC appreciates this opportunity to comment on the current BPL Notice of Inquiry and reiterates its full support for the efforts of the FCC in this regard.